

1 PHILLIP A. TALBERT
2 Acting United States Attorney
3 PETER K. THOMPSON (HI 5890)
4 Acting Regional Chief Counsel
5 MARGARET LEHRKIND, CSBN 314717
6 Special Assistant United States Attorney
7 Social Security Administration
8 160 Spear Street, Suite 800
9 San Francisco, CA 94105
10 Telephone: (510) 970-4829
11 Facsimile: (415) 744-0134
12 Attorneys for Defendant

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15 UNITED STATES DISTRICT COURT
16 EASTERN DISTRICT OF CALIFORNIA
17 FRESNO DIVISION

18 RONNIE LEE HILL, JR.,
19 Plaintiff,
20 v.
21 KILOLO KIJAKAZI,
22 Acting Commissioner of Social Security,
23 Defendant.¹

24 No. 1:21-cv-00265-EPG

25 STIPULATION AND ORDER FOR EXTENSION
26 TO FILE DEFENDANT'S OPPOSITION TO
27 PLAINTIFF'S OPENING BRIEF
28 (ECF No. 14)

29 IT IS HEREBY STIPULATED, by and between Ronnie Hill (Plaintiff) and Kilolo
30 Kijakazi, Acting Commissioner of Social Security (Defendant), by and through their respective
31 counsel of record, that, with the Court's approval, Defendant shall have an extension of time of
32 sixty (60) days to file a Response to Plaintiff's Opening Brief. This is Defendant's first request

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¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on July 9, 2021. Pursuant
39 to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted,
40 therefore, for Andrew Saul as the defendant in this suit. No further action need be taken to
41 continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42
42 U.S.C. § 405(g).

1 for an extension on her Response to Plaintiff's Opening Brief. The current due date is January 5,
2 2022. The new date will be March 6, 2022. All other deadlines will extend accordingly.
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4 Good cause exists for this request. Defendant's counsel has worked diligently to meet the
5 timelines provided by the Court but has been prevented from doing so by her busy schedule.
6 Defendant's counsel has seventy-one other active cases in various stages of litigation and 24
7 responsive briefs due in the next 60 days including two Ninth Circuit answering briefs.
8 Additionally, Defendant's counsel has other responsibilities with another practice group in her
9 office where the work cannot be extended. Defendant's counsel is also covering a colleague's
10 workload who is out on long-term family leave. Defendant requests this extension in good faith,
11 and with no intent to delay these proceedings unnecessarily. Defendant apologizes to the Court
12 for any inconvenience caused by this delay.

13 Respectfully submitted,

14 DATE: December 20, 2021 /s/ *Melissa Newel*
15 MELISSA NEWEL
16 Attorney for Plaintiff
17 (as approved via email)
18 PHILLIP A. TALBERT
19 Acting United States Attorney
20 DATE: December 20, 2021 By /s/ *Margaret Lehrkind*
21 MARGARET LEHRKIND
22 Special Assistant United States Attorney
23 Attorneys for Defendant
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ORDER

Based on the above stipulation (ECF No. 14), IT IS ORDERED that Defendant shall file Defendant's response to Plaintiff's opening brief no later than March 7, 2022.² All other deadlines in the Court's scheduling order are extended accordingly.

IT IS SO ORDERED.

Dated: **December 22, 2021**

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE

² While the stipulation requested an extension until March 6, 2022, that day is a Sunday, and thus the Court sets March 7, 2022 as the applicable deadline.